## **EXHIBIT 2**



Mark J. Rochon Member (202) 626-5819 mrochon@milchev.com

February 25, 2009

## Via Overnight Mail

Honorable Ronald L. Ellis United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 1970 New York, NY 10007-1312

Re: Sokolow v. PLO, No. 04-cv-397 (GBD) (RLE) (SDNY)

Dear Magistrate Judge Ellis:

We received today Mr. Strachman's letter to you dated February 24, 2009 seeking "an informal conference in advance of filing a motion to compel submission of signed and verified interrogatory answers" from the Palestinian Authority and the Palestine Liberation Organization relating to personal jurisdiction discovery. I apologize for communicating directly with the Court by letter, but, given Mr. Strachman's request, I wanted to respond to the Court as quickly as possible.

As we previously indicated to Mr. Strachman, we have been in the process of obtaining the verifications for the answers to interrogatories that were served on January 29, 2009. The process unfortunately took longer than we had expected given the obvious geographical challenges, as well as the travel schedules of the persons verifying the answers. We have now obtained, and have sent to Mr. Strachman by separate correspondence today, the verifications signed by representatives of the Palestinian Authority and the Palestine Liberation Organization on February 22, 2009 and February 25, 2009, respectively.

We have asked Mr. Strachman to let us know whether, under the circumstances, he intends to withdraw his request for an informal conference set forth in his letter of February 24, 2009, as well as his desire to file a motion to compel submission of the verifications. Mr. Strachman or I will advise the Court of his position as soon as it is known.

As for Mr. Strachman's reference in his February 24, 2009 letter to unspecified deficiencies in the Defendants' January 29, 2009 responses to personal jurisdiction discovery, we have repeatedly asked Mr. Strachman to identify those deficiencies, and we remain willing to discuss them with Mr. Strachman if and when he does so.



Honorable Ronald L. Ellis February 25, 2009 Page 2

We appreciate the Court's consideration of this letter, and we are happy to address any questions the Court might have regarding the foregoing.

Respectfully submitted,

cc:

David J. Strachman, Esq. (by facsimile) Olimpio Squitieri, Esq. (by facsimile)